

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

IN RE:	§	
DEEPROOT CAPITAL MANAGEMENT,	§	
LLC, ET AL., <sup>1</sup>	§	BANKRUPTCY No. 21-51523-MMP
	§	LEAD CASE
DEBTORS.	§	JOINTLY ADMINISTERED

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**TRUSTEE’S WITNESS AND EXHIBIT LIST FOR JUNE 24 ,2025 HEARINGS ON:  
[1] NINTH INTERIM APPLICATION FOR ALLOWANCE OF HOURLY LEGAL FEES FOR  
PULMAN LEFLORE PULLEN & REED LLP, AS COUNSEL TO THE TRUSTEE FOR THE  
TIME PERIOD OF DECEMBER 1, 2024 TO APRIL 30, 2025; AND  
[2] MOTION FOR SUBSTANTIVE CONSOLIDATION  
[RELATING TO DKT. NOS. 356 AND 357 IN LEAD CASE]**

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John Patrick Lowe, Chapter 7 Trustee (“Trustee”), files this Witness and Exhibit List for the June 24, 2025 Hearings scheduled, relating to the matters listed below.

**MATTERS TO BE HEARD:**

- *Ninth Interim Application for Allowance of Hourly Legal Fees and Expenses for Pulman LeFlore Pullen & Reed, LLP, as Counsel to the Trustee for the Time Period of December 1, 2024 to April 30, 2025 [Dkt. No. 356] (the “Ninth Fee Application”)*

AND

- *Motion for Substantive Consolidation [Dkt. No. 357 in Lead Case 21-51523] (the “Motion”)*

**TRUSTEE’S WITNESSES:**

Trustee designates the following witnesses:

1. J. Patrick “Pat” Lowe, Chapter 7 Trustee of the jointly administered bankruptcy estates;
2. Gregory Murray, CPA, court authorized accountant for Trustee;
3. Randall A. Pulman, Esq., counsel for Chapter 7 Trustee;

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<sup>1</sup> The jointly administered chapter 7 cases, along with their respective case numbers and the last four digits of each Debtor's federal tax identification number, are: In Re: Policy Services, Inc. 21-51513 (2864), In Re: Wizard Mode Media, LLC, 21-51514 (3205), In Re: deeproot Pinball LLC, 21-51515 (0320), In Re: deeproot Growth Runs Deep Fund, LLC, 21-51516 (8046), In Re: deeproot 575 Fund, LLC, 21-51517 (9404), In Re: deeproot 3 Year Bonus Income Debenture Fund, LLC, 21-51518 (7731), In Re: deeproot Bonus Growth 5 Year Debenture Fund, LLC, 21-51519 (9661), In Re: deeproot Tech LLC, 21-51520 (9043), In Re: deeproot Funds LLC, 21-51521 (9404), In Re: deeproot Studios LLC , 21-51522 (6283), and In Re: deeproot Capital Management, LLC, 21-51523 (2638), each a “**Bankruptcy Estate**” or “**Estate**” and collectively, the “**Bankruptcy Estates**” or “**Estates**”.

4. Any witness called or designated by any other party;
5. Any rebuttal or impeachment witnesses, as necessary; and
6. Any person present at the Hearings (live or via WebEx)

Trustee reserves the right to amend or supplement this list at any time prior to the hearing.

### **TRUSTEE'S EXHIBITS**

- Trustee requests that the Court take judicial notice of the exhibits attached to the *Ninth Interim Application for Allowance of Hourly Legal Fees and Expenses for Pulman LeFlore Pullen & Reed, LLP, as Counsel to the Trustee for the Time Period of December 1, 2024 to April 30, 2025* [Dkt. No. 356] for use at the hearing on the Ninth Fee Application.

Ex. #	Description	Offered	Objection	Admitted/ Not Admitted	Disposition
1	Organizational Chart [Exhibit B to <i>Motion for Substantive Consolidation</i> , Dkt. 357 in Lead Case]				
2	2013 Balance Sheet for joint debtor Policy Services, Inc., Case No. 21-51513 [Exhibit C to <i>Motion for Substantive Consolidation</i> , Dkt. 357 in Lead Case]				
3	Annual YE Balance Sheet 2013 – 2021 for joint debtor deeproot Funds, LLC, Case No. 21-51521 [Exhibit D to <i>Motion for Substantive Consolidation</i> , Dkt. 357 in Lead Case]				
4	Account Balance and Claims Register Totals for all 11 jointly administered cases [Exhibit E to <i>Motion for Substantive Consolidation</i> , Dkt. 357 in Lead Case]				
5	Report of Greg T. Murray CPA, PLLC, dated 6/30/2023				
6	Trustee Form 2 for joint debtor Policy Services, Inc. 21-51513				

7	Claims Register Summary for joint debtor Policy Services, Inc. 21-51513				
8	Trustee Form 2 for joint debtor Wizard Mode Media LLC 21-51514				
9	Claims Register Summary for joint debtor Wizard Mode Media LLC 21-51514				
10	Trustee Form 2 for joint debtor deeproot Pinball, LLC 21-51515				
11	Claims Register Summary for joint debtor deeproot Pinball, LLC 21-51515				
12	Trustee Form 2 for joint debtor deeproot Growth Runs Deep Fund, LLC 21-51516				
13	Claims Register Summary for joint debtor deeproot Growth Runs Deep Fund, LLC 21-51516				
14	Trustee Form 2 for joint debtor deeproot 575 Fund LLC 21-51517				
15	Claims Register Summary for joint debtor deeproot 575 Fund LLC 21-51517				
16	Trustee Form 2 for joint debtor deeproot 3 Year Bonus Income Fund LLC 21-51518				
17	Claims Register Summary for joint debtor deeproot 3 Year Bonus Income Fund LLC 21-51518				
18	Trustee Form 2 for joint debtor deeproot BonusGrowth 5 Year Debenture Fund, LLC 21-51519				
19	Claims Register Summary for joint debtor deeproot BonusGrowth 5 Year Debenture Fund, LLC 21-51519				
20	Trustee Form 2 for joint debtor deeproot Tech LLC 21-51520				
21	Claims Register Summary for joint debtor deeproot Tech LLC 21-51520				
22	Trustee Form 2 for joint debtor deeproot Funds LLC 21-51521				
23	Claims Register Summary for joint debtor deeproot Funds LLC 21-51521				

24	Trustee Form 2 for joint debtor deeproot Studios LLC 21-51522				
25	Claims Register Summary for joint debtor deeproot Studios LLC 21-51522				
26	Trustee Form 2 for joint debtor deeproot Capital Management, LLC Policy Services, Inc. 21-51523 [LEAD CASE]				
27	Claims Register Summary for joint debtor deeproot Capital Management, LLC Policy Services, Inc. 21-51523 [LEAD CASE]				
28	PLPR Invoices to support relief requested in Ninth Fee Application [Exhibits D-1 through D-63 to Dkt. No. 356 in Lead Case 21-51523]				
	Any exhibits listed by any other party				
	Any rebuttal or impeachment exhibits				

Trustee reserve the right to amend or supplement this list at any time prior to the hearing.

Dated: June 19, 2025

Respectfully submitted,

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**ATTORNEYS FOR JOHN PATRICK LOWE,  
CHAPTER 7 TRUSTEE FOR THE JOINTLY  
ADMINISTERED CASE OF IN RE DEEPROOT  
CAPITAL MANAGEMENT, LLC ET AL.**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 19<sup>th</sup> day of June, 2022, I electronically filed the foregoing document using the CM/ECF system, which will serve the document to the following parties requesting notice; a copy of the exhibits will also be provided via email to these same parties.

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